

Energy Fuels Resources (USA) Inc. 225 Union Blvd. Suite 600
Lakewood, CO, US, 80228
303-974-2140
www.energyfuels.com

January 14, 2016

Mr. Paul Baker State of Utah Department of Natural Resources Division of Oil, Gas and Mining 1594 West North Temple Suite 1210 Box 145801 Salt Lake City, UT 84114-5801

RECEIVED

JAN 19 2016

DIV. OF OIL, GAS & MINING

RE: Submittal of Large Mine NOI Revision for Redd Block IV Mine (M/037/0046)

Dear Paul:

In response to your request to re-evaluate the Redd Block IV Mine (M/037/0046) reclamation cost estimate, Energy Fuels Resources (USA) Inc. (Energy Fuels) is submitting the enclosed Application for Mineral Mine Plan Revision or Amendment along with two printed copies of the revised Attachment D Surety Estimate.

Please contact me at 303-389-4133 or <u>areither@energyfuels.com</u> if you have any questions or need additional information.

Sincerely,

Andrea Reither

Senior Environmental Specialist

Digital Cc: M. Bradley, W. Western (UDOGM), S. Bakken, T. White (Energy Fuels)

Form MR-REV-att (DOGM – Revise/Amend Change Form) (Revised September 14, 2005)



Application for Mineral Mine Plan Revision or Amendment

Mine	Mine Name: Redd Block IV			File Number: M/ 037 / 0046			
maps and pages, or	drawings that are to other information as	b be added, repla needed to spec	mining and reclamation plan of aced, or removed from the planifically locate, identify and revit of the description.	in. Include changes of the	table of conten	its, section of	the plan,
	DETAILE	D SCHEDUL	E OF CHANGES TO TH				
	1		DESCRIPTION OF I	MAP, TEXT, OR MA	TERIALS TO	O BE CHAI	NGED
□ ADD	X REPLACE	□ REMOVE	Attachment D Surety E	stimate			
□ ADD	□ REPLACE	□ REMOVE					
□ ADD	□ REPLACE	□ REMOVE					
□ ADD	□ REPLACE	□ REMOVE				17.76	
□ ADD	□ REPLACE	□ REMOVE					
□ ADD	□ REPLACE	□ REMOVE				w 31 s	
□ ADD	□ REPLACE	□ REMOVE					
□ ADD	□ REPLACE	□ REMOVE					
□ ADD	□ REPLACE	□ REMOVE					
□ ADD	□ REPLACE	□ REMOVE					
□ ADD	□ REPLACE	□ REMOVE					
□ ADD	□ REPLACE	□ REMOVE					
□ ADD	□ REPLACE	□ REMOVE					
is appli	cation is true tah in referen	and correc	sible official of the a et to the best of my in nitments and obligat	nformation and be	elief in all r		vith the
at raine			/ Sign Iva	nic, rostuon	Janua Date	ary 14, 2016	
eturn to:							
	State of Utah						
	Department of Division of Oil, 1594 West Nor Box 145801	Gas and Minir	ng		File Approved:	OR DOGM e #: M/	
	Salt Lake City, Phone: (801) 53		5801 (801) 359-3940	Bond Adjustme	to \$		

O:\FORMS\MR-REV-att.doc

Reclamation Cost Estimate Redd Block Mine



Prepared by
Energy Fuels Resources (USA) Inc.
225 Union Boulevard, Suite 600
Lakewood, CO 80228



January 2016

S:\Environmental\UT\ReddBlock\Permitting\DOGM\2015.11 Redd Block IV Bond Update\2016-01-14 RB Reclamation Cost Estimate.docx

1.0 Introduction

The Redd Block Reclamation cost estimate utilizes reference materials including Mine Maps, 2014 RS Means, and the UDOGM reclamation cost for 9 acres of disturbance. A number of the smaller tasks were estimated on a lump sum basis based on quotes from local contractors or the company's experience on similar sites.

This reclamation cost estimate is designed to quantify the reclamation liability for the Redd Block Mine

2.0 Reclamation Tasks

The reclamation tasks at the Redd Block Mine include demolition of a concrete pad, abandoning 9 monitoring wells, and reclaiming 9 acres of disturbance. Mobilization and demobilization has been determined to have no cost since the Redd Block Mine is with 50 Miles of Moab, which is the closest Wheeler Cat location

2.1 Project Indirect Costs

The project's indirect costs factors are provided by the Division of Oil, Gas and Mining. These factors were used to calculate the Contingency, Engineering Redesign, Main Office Expense, and project Management Fee. Details of the project indirect costs are shown on the Summary worksheet.

3.0 Summary

Energy Fuels estimates the reclamation cost (in \$2020) for the combined Redd Block Mine is:

•	Demolition of the Concrete Pad –	\$2,218
•	Well Abandonment -	\$10,848
•	Disturbed Land Reclamation -	\$55,800
•	Project Indirect Costs –	\$13,600
•	Total –	\$83,000

A detailed description and reclamation cost estimate is provided in the following attachments.

Redd Block Mine
Reclamation Cost Workbook

Redd Block IV Bonding Calculations 2015

Direct Costs

Task 1: Abandon Existing Wells	\$10,848	
Task 2: Demolition of Concrete Pad	\$2,218	
Task 3: Disturbed Land Reclamation	\$55,800	
Subtotal Direct Costs	\$68,866	
Indirect Costs		
Mob/Demob	\$0	0.0%
Contingency	\$3,443	5.0%
Engineering Redesign	\$1,722	2.5%
Main Office Expense	\$4,683	6.8%
Project Management Fee	\$1,722	2.5%
Subtotal	\$11,569	16.8%
Total Cost 2015	\$80,435	
Escalation (0.5% every year for 5 years)	\$2,031	
Reclamation Cost Escalated to 2020	\$82,466	
Bond Amount (rounded to nearest \$1,000)	\$83,000	

Description: Support calculations for the reclamation cost estimate for the Redd Block IV Mine

Task 1: Abandon Existing Wells

Assumptions

The existing wells have already been completed. Reclamation will consist of removing protective surface shroud, fill the well with a bentonite material and placing a surface concrete plug, to 3 feet below surface.

A cost estimate for labor and materials was provided by Bayles Exploration Inc. out of Blanding Utah.

The 9 wells consist of 3@ 2" PVC to a depth of 100', 3@ 4" PVC to a depth of 300', and 3@ 4" steel to a depth of 1000'.

<u>Item</u>	Quantity	Cost		
Materials	N/A	\$	7,028	
Equipment and Labor	N/A	\$ 3,820		
	Total	\$	10.848	

Task 2: Demolition of Concrete Pad

Assumptions

Concrete pads will be broken into manageable pieces and placed within the Development Rock Area prior to final grading. RS Means reference 02 41 13 17 5300 was used to estimate the costs. \$19.80 per square yard.

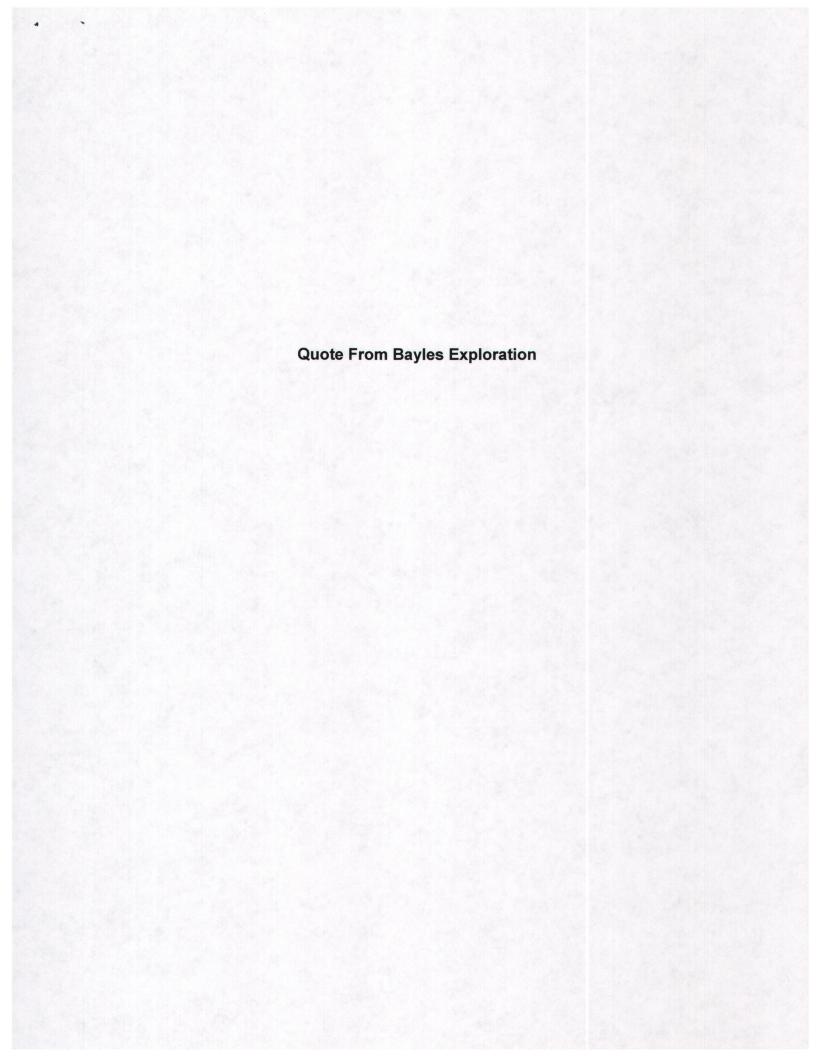
<u>Item</u>	Quantity (sf)	Quantity (sy)	RS Means Reference	Unit Cost	
Existing Pad (24' x 42')	1,008	112	02 41 13 17 5300	\$ 19.80	
		Profession States	Total	\$ 2.217.60	

Task 3: Disturbed Land Reclamation

Assumptions

The costs to reclaim the disturbed area of the Redd Block IV Mine are estimated by using UDOGM's SMO with No Openings workbook. The 5 year escalated value was used for the cost per acre reclaimed.

<u>Item</u>	Quantity	Reference	Unit Cost
First 6 acres Existing Disturbed Area	1	UDOGM	\$ 38,100.00
Additional acres (3 acres)	3	UDOGM	\$ 5,900.00
		Total	\$ 55,800.00



BAYLES EXPLORATION INC

159 West 700 North Blanding, Utah 84511 Phone: 435-678-2434 Fax: 435-678-4032

FAX

To: Ryan Ellis Date: 11-19-15
#: <u>Cellis@epergyfuels & Com</u> Pages: Phone: <u>303 - 974 - 2151 Lakewood</u> , CO
RE:CC:
COMMENTS: Scope of Work:
Abardon wells othe Redblock Mine:
3 wells w 2" PVC to 100' each
3 wells w/4" PVC to 300' each
3 wells w/4" Steel to 1000'each
Materials - \$ 7028.00 Equipment + Labor - \$ 3880.00
Total project = \$ 10,848,00
Tal Digh